

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Case No.: 16-21628 CMB
))
GATEWAY ENTERTAINMENT))
STUDIOS, LP) Chapter 11
))
DEBTOR,))
))
) Document No.: 4
))
GATEWAY ENTERTAINMENT))
STUDIOS, LP))
))
Movant,))
))
vs.))
))
) No Respondent.

DEBTOR'S APPLICATION FOR EMPLOYMENT OF COUNSEL

AND NOW, comes the Debtor by and through its attorney Richard R. Tarantine, Esquire and, pursuant to Section 327(a) of the Bankruptcy Code and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, files this Application for Employment of Counsel and in support thereof states as follows:

1. Debtor filed a Voluntary Petition under Chapter 11 of the Bankruptcy Code on April 29, 2016. The case was filed on an emergency basis.
2. The Debtor has engaged the services of Richard R. Tarantine, Esquire to represent it during the course of his reorganization under Chapter 11 of the Bankruptcy Code.
3. Richard R. Tarantine, Esquire was selected for his knowledge and experience in the bankruptcy area, especially with respect to the reorganization of small-business debtors.
4. As bankruptcy counsel, Richard R. Tarantine, Esquire will assist the Debtor in taking all necessary actions to protect and preserve the bankruptcy estate, in negotiating with

creditors and other parties in interest, in advising the Debtor in connection with this proceeding, in preparing the plan of reorganization and disclosure statement, in preparing any necessary pleadings and attending court hearings thereon, in attending the meeting of creditors, in the preparation of any objections to claims in the Chapter 11 case, in advising the Debtor regarding possible preference actions, in representing Debtor in relation to acceptance or rejection of executory contracts, and in performing other legal services normally incident to Chapter 11 cases.

5. To the best of the Debtor's knowledge, Richard R. Tarantine, Esquire is a "disinterested person" as that term is defined in Section 101(14) of the Bankruptcy Code and does not hold any interest materially adverse to the bankruptcy estate.

6. To the best of the Debtor's knowledge, Richard R. Tarantine, Esquire has had no connection with the Debtor, Creditors, other parties in interest, their attorneys or accountants, the United States Trustee, or any other person employed in the Office of the United States Trustee, except that he may have served as a professional person in other matters, wholly unrelated to the Debtor or to this case, in which attorneys or accountants of the Debtor, Creditors or other parties in interest also may have served as professional persons. A Verified Statement pursuant to Bankruptcy Rule 2014(a) is attached hereto as Exhibit "A."

7. Subject to this Court's jurisdiction with respect to professional fees, Richard R. Tarantine, Esquire has entered into a written agreement with the Debtor to charge for his services at the rate of Three Hundred Dollars (\$300.00) per hour, based on increments of one-tenth (1/10) of an hour. Pursuant to the agreement, Debtor has also agreed to reimburse Richard R. Tarantine, Esquire for any out-of-pocket expenses incurred in connection with this bankruptcy, including filing fees, delivery services, long distance telephone charges and travel expenses, to

the extent any of these are required. Debtor and Richard R. Tarantine, Esquire both understand that final fees are subject to approval by this Court.

8. Debtor believes that the employment of Richard R. Tarantine, Esquire as Counsel for Debtor is in the best interests of the Debtor and his creditors.

9. Counsel has agreed not to share with any other person or firm the compensation to be paid for services rendered in connection with this case.

WHEREFORE, Debtor, Gateway Entertainment Studios LP, respectfully requests this Honorable Court enter an Order authorizing the Debtor to employ Richard R. Tarantine, Esquire as attorney for the Debtor, effective from April 29, 2016, pursuant to Section 327(a) of the Bankruptcy Code and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, under the terms and conditions set forth in this Application, and grant such other relief to the Debtor as is just and proper.

Dated: April 30, 2016

/s/ Richard R. Tarantine
Richard R. Tarantine
PA ID#49082

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Pittsburgh, PA 15219
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**CERTIFICATE OF SERVICE OF DEBTOR'S APPLICATION
FOR EMPLOYMENT OF COUNSEL**

I certify under penalty of perjury that I served Debtor's Application for Employment of Counsel on the following:

U.S. Trustee
Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Gateway Entertainment Studios, LP
77 31st Street
Pittsburgh, PA 15201

Service was made by first class mail, postage prepaid.

EXECUTED ON: April 30, 2016

/s/ Richard R. Tarantine
Richard R. Tarantine, Esquire
Attorney for Debtor